


UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	Criminal No. 21cr10333
	)	
v.	)	Violation:
	)	
(1) MARK ANTHONY FIGUEROA, and	)	<u>Count One</u> : Money Laundering Conspiracy
	)	(18 U.S.C. § 1956(h))
	)	
Defendants	)	<u>Forfeiture Allegation</u> :
	)	(18 U.S.C. § 982(a)(1))

INDICTMENT

COUNT ONE

Money Laundering Conspiracy  
(18 U.S.C. § 1956(h))

The Grand Jury charges:

From in or about February 2019 through in or about May 2020, in Boston and elsewhere in the District of Massachusetts, the Southern District of California, and elsewhere the defendants,

(1) MARK ANTHONY FIGUEROA, and



conspired with each other and with others known and unknown to the Grand Jury to:

- (a) conduct and attempt to conduct financial transactions, knowing that the property involved in such transactions represented the proceeds of some form of unlawful activity, and which in fact involved the proceeds of specified unlawful activity, that is, conspiracy to distribute and possess with intent to distribute fentanyl, cocaine, and other controlled substances, and attempt to possess with intent to distribute fentanyl, cocaine, and other controlled substances, in violation of Title 21, United States Code, Section 846; and distribution of and possession of with intent to distribute fentanyl,

cocaine, and other controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1), with the intent to promote the carrying on of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and (b) conduct and attempt to conduct financial transactions, knowing that the property involved in such transactions represented the proceeds of some form of unlawful activity, and which in fact involved the proceeds of specified unlawful activity, that is, conspiracy to distribute and possess with intent to distribute fentanyl, cocaine, and other controlled substances, and attempt to possess with intent to distribute fentanyl, cocaine, and other controlled substances, in violation of Title 21, United States Code, Section 846; and distribution of, and possession of with intent to distribute fentanyl, cocaine, and other controlled substances, in violation of Title 21, United States Code, Section 841(a)(1); and knowing that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

MONEY LAUNDERING FORFEITURE ALLEGATION  
(18 U.S.C. § 982(a)(1))

The Grand Jury further finds:

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 1956, set forth in Count One, the defendants,

(1) MARK ANTHONY FIGUEROA, and  
[REDACTED]

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offenses, and any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

a. \$723,560 to be entered in the form of a money judgment.


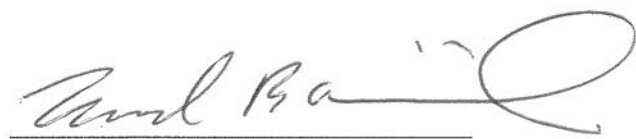
2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 982(a)(1), as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 982(a)(1).

A TRUE BILL

  
FOREPERSON  
THEODORE B. HEINRICH  
ASSISTANT UNITED STATES ATTORNEY  
DISTRICT OF MASSACHUSETTS

District of Massachusetts: NOVEMBER 10, 2021  
Returned into the District Court by the Grand Jurors and filed.

  
DEPUTY CLERK